

## Module 16: Records

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## GUIDANCE

The purpose of records management is fairly simple —to help you **demonstrate** that your organization is actually implementing the EMS as designed. While records have value internally, you also may need to provide them to **external parties** (such as customers, a registrar, or the public), as **evidence of EMS implementation**. Records management is sometimes seen as bureaucratic, but it is difficult to imagine a system **operating consistently** without accurate records.

### What are “records”?

Records provide evidence that the processes that make up your EMS are being implemented as described.

The basics of records management are straightforward: you need to decide **what** records you will keep, **how** you will keep them and for **how long**. You should also think about how you will **dispose** of records once you no longer need them.

If your organization has an ISO 9001 (or other) management system, you should have a process in place for managing records. This process could be adapted for EMS purposes.

### Hints:

- Start by **identifying** what **EMS records are required**. Look at your other procedures and work instructions to determine **what evidence is needed to demonstrate implementation**. Also consider records that are required by various **legal requirements**.
- **Focus on records that add value** — avoid bureaucracy. If records have no value or are not specifically required, don't collect them. The records you choose to keep should be **accurate and complete**.
- You may need to generate certain **forms** in order to implement your EMS. When these forms are filled out, they become records. Forms should be **simple and understandable** for the users. This Guide provides example forms for some EMS modules that you may include as EMS records if they are relevant to your operations and EMS.
- Establish a records retention policy and stick to it. Make sure that your policy takes into account **records retention requirements specified in applicable environmental regulations**. For example, hazardous waste manifests must be maintained for a specified period of time under RCRA. Therefore, that would be an appropriate period of time to use for this record as part of your EMS.

- In designing your records management process, be sure to consider:
  - who needs access?
  - to what records?
  - in what circumstances?
- If your organization uses computers extensively, consider using an electronic EMS records management system. Maintaining records electronically can provide an excellent means for rapid retrieval of records as well as controlling access to sensitive records.
- Think about which records might require additional security. Do you need to restrict access to certain records? Should a back-up copy of critical records be maintained at another location? Should a hard copy of some records be maintained in case an inspector arrives and your computer system is down (this has actually happened to facilities).

### **Types of Records You Might Maintain (Examples):**

- legal, regulatory, and other code requirements
- results of environmental aspects identification
- reports of progress towards meeting objectives and targets
- permits, licenses, and other approvals
- job descriptions and performance evaluations
- training records
- EMS audit and regulatory compliance audit reports
- reports of identified nonconformities, corrective action
- plans, and corrective action tracking data
- hazardous material spill / other incident reports
- communications with customers, suppliers, contractors, and other external parties
- results of management reviews
- sampling and monitoring data
- maintenance records
- equipment calibration records

#### **Key Questions**

- ☒ what records are kept?
- ☒ who keeps them?
- ☒ where are they kept?
- ☒ how are they kept?
- ☒ how long are they kept?
- ☒ how are they accessed?
- ☒ how are they disposed?



## ***TOOLS***

### **Tool 16-1: Records Management Worksheet**

|  |  |
|--|--|
| Have we <b>identified what records</b> need to be maintained? Where is this defined? |  |
| Have we determined records <b>retention times</b> ? Where is this defined?           |  |
| Have we established an effective <b>storage and retrieval</b> system?                |  |
| <i>Our next step on records is to ...</i>  |  |

## **Tool 16-2: Sample Checklist for Records of Supporting Documentation**

*Note: This is an example checklist format for records that you should modify for the records that are important to your EMS.*

PLEASE PROVIDE COPIES OF THE FOLLOWING:

- \_\_\_\_\_ Facility organization chart
- \_\_\_\_\_ Staffing and organization chart for the EMS
- \_\_\_\_\_ Facility environmental policy
- \_\_\_\_\_ Samples of supporting documentation for reporting and communication networks such as meeting notices, meeting minutes, memoranda, etc.
- \_\_\_\_\_ Training records related to EMS training.
- \_\_\_\_\_ Documentation records for monitoring and measurement efforts.
- \_\_\_\_\_ Samples of written EMP performance and status reports
- \_\_\_\_\_ Samples of facility-specific environmental policies and procedures



## ***EXAMPLES***

### **Example 16-1: Sample of Environmental Records Organizer**

|                                   |                                       |
|-----------------------------------|---------------------------------------|
| Air Emissions Regulations         | Loss Prevention Information           |
| Air Emissions Fees                | Other Permits & Permit Applications   |
| Air Emissions Inventories         | Pollution Prevention (P2) Regulations |
| Air Emissions Permits             | Pollution Prevention Fees             |
| Air Permit Applications           | Pollution Prevention Reporting        |
| Air Permit(s): Historical         | Recycling Information                 |
| Annual Licenses & Fees            | Recycling Projects                    |
| Compliance Reporting              | Special Wastes                        |
| Compliance Plans                  | Solid Waste Permit                    |
| Community Right-to-Know           | Solid Waste Fees                      |
| EPCRA Regulations                 | Spill Reports                         |
| EPCRA Reporting                   | Spill Response Actions                |
| Hazardous Waste Regulations       | Stormwater Regulations                |
| Hazardous Waste Permit/ID Number  | Stormwater Permit                     |
| Hazardous Waste Fees              | Training Records                      |
| Hazardous Waste Biennial Report   | VOC/HAPs Reporting                    |
| Hazardous Waste: Open Manifests   | VOC Annual Analysis                   |
| Hazardous Waste: Closed Manifests | Wastewater Regulations                |
| Historical Data                   | Wastewater Fees                       |
| Indoor Air Quality                | Wastewater Permit                     |
|                                   | Wastewater: Semi-Annual Reporting     |

### Example 16-2: Sample EMS Records Management Table

|  |   |
|--|---|
| <b>Title:</b> EMS RECORDS MANAGEMENT TABLE<br><b>Revision Date:</b> November 7, 2000<br><b>Print Date:</b> March 23, 2002 ( <u>Uncontrolled</u> document if printed) | <b>Doc. No.:</b> EMF-4.5.3<br><b>Approval by:</b><br><b>Page 1 of 2</b> |
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### EMS Records Management Table

The following table lists records related to the Environmental Management System, in accordance with EMP-4.5.3 (Record Keeping Procedure).

| Record Type   | Person Responsible     | Location              | File Method            | Retention Minimum |
|---|------------------------|-----------------------|------------------------|-------------------|
| <b>ADMINISTRATION</b>                                   |                        |                       |                        |                   |
| Records on costs - purchasing, operations, and disposal | Office Manager         | Admin. Office         | Date order             | 3 years           |
| Utility bills   | Office Manager         | Admin. Office         | Date order             | 3 years           |
| Record of annual waste quantity received                | Office Manager         | Admin. Office         | Date order             | Life of Co.       |
| Certificates of Insurance                               | Office Manager         | Admin. Office         | Date order             | Life of Company   |
| Waste Analysis Sheets                                   | Office Manager         | Admin. Office         | Customer name          | 3 years           |
| Waste Manifests - outgoing                              | Office Manager         | Admin. Office         | Date order             | 3 years           |
| <b>HUMAN RESOURCES</b>                                  |                        |                       |                        |                   |
| Training Needs Analysis and Training Records            | Human Resource Manager | Human Resource Office | By type and date order | 5 years           |
| <b>ENVIRONMENTAL</b>                                    |                        |                       |                        |                   |
| Incident Reports  | Env. Dept.             | Env. Office           | Date order             | 3 years           |
| Complaint Reports                                       | Env. Dept.             | Env. Office           | Date order             | 3 years           |
| EMS Communications with external parties                | Env. Dept.             | Env. Office           | Issue                  | 3 years           |

**EMS Template**  
**Revision 2.0 (March 2002)**

| Record Type  | Person Responsible           | Location                     | File Method | Retention Minimum                   |
|--|------------------------------|------------------------------|-------------|-------------------------------------|
| Decision regarding external communication of significant environmental aspects   | Env. Dept.                   | Env. Office                  | Date order  | 3 years                             |
| Major Source Determination Records   | Env. Dept.                   | Env. Office                  | Date order  | Life of Co.                         |
| Title V Permit Exemption   | Env. Dept.                   | Env. Office                  | Date order  | Life of Company                     |
| Correspondence regarding Air Notices   | Env. Dept.                   | Env. Office                  | Date order  | 5 years                             |
| Odor Control System Permit   | Env. Dept.                   | Env. Office                  | Date order  | 5 years or per Permit               |
| Air Emission Reports   | Env. Dept.                   | Env. Office                  | Date order  | 5 years                             |
| Records on waste disposal sites used   | Env. Dept.                   | Env. Office                  | Site name   | Life of Co.                         |
| EMS Audit Reports  | Env. Dept.                   | Env. Office                  | Date order  | 5 years                             |
| EMS Corrective and Preventive Action Notices (Form 15-sa) and Database Logging Summary (Tracking Log format of Form 15-2b) | Env. Dept - EMR              | Env. Office – CAPAN database | Date order  | 2 years after completion of action. |
| EMS Management Review Records (Form 18-2)  | Env. Dept. – EMS Coordinator | Env. Office                  | Date Order  | Life of company                     |

*Note: This example does not include all records that would need to be maintained for the EMS or for environmental regulatory purposes but is included for illustrative purposes.*